

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Advanced Television Systems ) MM Docket No. 87-268  
and Their Impact upon the )  
Existing Television Broadcast )  
Service )

To: The Commission

**REPLY TO KOLO-TV OPPOSITION TO  
SUPPLEMENT TO PETITION FOR RECONSIDERATION**

Sierra Broadcasting Company ("Sierra"), licensee of KRNVT(TV), Reno, Nevada, hereby replies to the September 23, 1997 pleading filed by Stephens Group, Inc. ("KOLO-TV"), opposing Sierra's September 8, 1997 Supplement to Petition for Reconsideration. Sierra submits that KOLO-TV's arguments fail to refute Sierra's demonstration that its requested change in DTV channel allotment is necessary to avoid significant service losses to KRNVT's viewers.

**I. Background**

On April 26, 1997, the Federal Communications Commission released its Sixth Report and Order establishing a Table of Allotments for digital television channels. One of the Commission's stated goals for its table was to provide DTV service areas that would replicate as closely as possible the NTSC service currently provided to viewers in order that they could continue to have access to the stations upon which they currently rely.

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Notwithstanding this expressed purpose, as to viewers in the Reno, Nevada market, the Commission's table fell far short of its intended purpose. KRNV, Reno, was allotted DTV Channel 33, which would give KRNV a DTV coverage of only 59.4 percent of the area that it currently serves as a NTSC station. In terms of population, KRNV would have only 71 percent replication of its NTSC service. Some 110,000 persons in the station's current viewership would lose Grade B service. KRNV, indeed, has the dubious distinction of having the worst DTV to NTSC replication of any television station in the country.

Sierra found a solution to this extraordinary dilemma. Following release of OET Bulletin 69, Sierra's engineers were able to determine that DTV Channel 9 could be used for KRNV if it were located on Slide Mountain, near Reno. As Sierra noted, negotiations were already underway to develop that area as a community antenna site. Although another Reno station, KOLO-TV, currently operates on NTSC Channel 8, concerns for adjacent channel interference would be negated because KOLO-TV already is located on Slide Mountain, and, thus, the two stations would be co-located.

**II. KOLO-TV Fails to Demonstrate That Sierra's Proposal  
Is in Any Way Inconsistent with Commission Rules or Policy**

KOLO-TV, which has not, to Sierra's knowledge, previously registered any complaint about its own DTV allotment, now suggests that Channel 9 be awarded to it instead. It argues first that DTV Channel 9 would cause co-channel interference to KQED(TV), San Francisco.<sup>1</sup> KOLO-TV fails to note, however, that Sierra's proposed Channel 9 location would be fully consistent with the new spacing rules, Section 73.623, announced in the Sixth Report and

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<sup>1</sup> Interestingly, KOLO-TV fails to explain why the supposed interference would not be  
(Continued...)

Order. As demonstrated in the attached engineering statement of D.L. Markley and Associates, assuming typical Slide Mountain coordinates, a KRNV DTV operation on Channel 9 would meet the required 273.6 kilometer spacing to KQED. The Commission has stated that no further demonstration is required: "[W]e are adopting our spacing proposals as the criteria for adding future DTV allotments. Geographic spacing provides a clear and simple measure of acceptability of an allotment proposal without the need to engage in extensive analysis of interference and has been used successfully in the television service for many years." Sixth Report and Order at ¶ 221. KOLO-TV has shown nothing to indicate why the Commission should impose a different standard here.

KOLO-TV also suggests that, as KOLO-TV's competitor, Sierra would be disinclined to cooperate in instances of adjacent channel interference. KOLO-TV cites no basis for determining that Sierra -- or any licensee -- would wilfully create or permit interference.

Sierra submits that co-ownership of adjacent channel stations is not addressed in the Sixth Report and Order. Although KOLO-TV cites paragraphs 85 and 90 of the Sixth Report and Order in support of its theory, those paragraphs say nothing about the ownership of adjacent channel stations. Indeed, paragraph 90 speaks instead to the desirability of maximum replication. Sierra notes that the DTV Table of Allotments includes many examples of proposed adjacent channel operation where the two stations are independently owned. The Los Angeles market, for example, will have DTV Channel 59 operating adjacent to the independently owned NTSC Channel 58 and DTV Channel 8 next to the independently owned

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(...Continued)  
 created if KOLO-TV used Channel 9 instead of Sierra.

NTSC Channel 9. Clearly, the Commission has recognized the acceptability of such a situation.

Moreover, KOLO-TV has not, to Sierra's knowledge, previously requested Channel 9 in the form of a petition for reconsideration, nor has it previously alerted the Commission to any dissatisfaction with its allocation of DTV Channel 23. KOLO-TV should not now be allowed to let another licensee do its exploratory work and then claim the results for its own.

KOLO-TV's final assertion is that Sierra's specification of the Slide Mountain site is procedurally inappropriate in the current rulemaking context because its impact on other broadcasters would be difficult to estimate. It cites no authority for this proposition. Sierra believes, however, that the Commission's technical staff is capable of coping with the required analysis, which should be no more complex than the analysis that is required when any licensee requests a different channel. In addition, it would be more administratively efficient to consider Sierra's proposals as a unit, rather than breaking them up as KOLO-TV suggests.


Moreover, Sierra submits that there are important public interest considerations to offset whatever procedural impediments may be involved. First, the proposed use of a community antenna site would be consistent with long-standing FCC policies and environmental principles favoring co-location of RF facilities. Second, the extraordinary nature of the service losses that would be caused were KRNV forced to remain on DTV Channel 33 warrants whatever slight flexibility may be required in the application of FCC procedures in order to avoid curtailing service to the 110,000 persons in the projected loss area. As stated in its initial Petition for Reconsideration, if Sierra cannot change channel and location, KRNV will not survive the transition to digital television.

**III. Conclusion**

For the reasons stated herein, Sierra submits that the arguments advanced by KOLO-TV should be summarily rejected and that the Commission should modify its DTV Table of Allotments as requested in Sierra's August 22, 1997 Supplement.

Respectfully submitted,

SIERRA BROADCASTING CORPORATION

By 

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Its Counsel

Dated: October 3, 1997

**ENGINEERING STATEMENT**

The following engineering statement and attached exhibits have been prepared for Sierra Broadcasting ("Sierra"), licensee of KARNV(TV) at Reno, Nevada, and are in support of their Reply Comments to "Opposition of KOLO-TV to Sierra Broadcasting" as filed by Stephens Group, Inc., licensee of KOLO-TV at Reno, Nevada ("KOLO-TV").

Sierra has filed comments concerning the DTV Table of Allotments. In particular, Sierra has requested that channel 9 be allocated to Reno, Nevada for use as a DTV facility and that the allotment of channel 9 be assigned to KARNV as its digital facility. In its comments, Sierra requested that the allocation of channel 9 be made at a different location than the existing NTSC station.

It was clearly stated in those comments that the requested coordinates were in an area being developed as a new community antenna site to be used by multiple broadcasters in the Reno area. A group of stations has been organized which is currently working with the Forest Service to develop that site. The owners

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of Sierra have already provided funds to be used by the Forest Service in preparing the necessary documentation for site development. It is apparent that the coordinates used were not in an effort to move "closer to the larger California markets", as claimed by KOLO-TV but were in an effort to utilize the community site where other stations will be located in the future.

The coordinates which were specified were correct. However, it is not known if the station will actually be located at those exact coordinates. The final coordinates for the station will depend upon the site development work and the exact location in the new site where at least one tower will be erected. It is anticipated that the coordinates are accurate within three seconds of both latitude and longitude.

Greater accuracy is not needed for the allocation. The coordinates which were specified plot at 9630 feet (2935 meters) above mean sea level. In the engineering statement provided by KOLO-TV, reference is made to the fact that the antenna would appear to be below ground. Obviously, such was not the case. The elevation for

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the site was taken from a 3" database. The computerized databases are often in error when it comes to the exact elevation of particular points. It is respectfully submitted that the center of the antenna would be closer to 9725 feet (2964 meters) above mean sea level.

In their comments, KOLO-TV asserts that the Commission assumed that it would be preferable to allocate adjacent DTV channels to existing NTSC stations. In this particular case, KOLO-TV currently operates on channel 8 and was assigned UHF channel 23 for its DTV facility. According to the Sixth Report & Order, that resulted in a 97.6% area match. KOLO-TV would lose essentially nothing in service as it changed to DTV. On the other hand, KRNK, which currently operates on channel 4, was allotted channel 33. The resultant area match was only 59.4% which is the lowest of any market in the United States. KRNK would have suffered the loss of 100,000 people in its service area.

From an engineering point of view, there is absolutely no reason why KOLO-TV would be preferred for the allocation as opposed to Sierra. KOLO-TV argues that KRNK cannot properly control its frequency or control

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its transmitter. The reason they give for that determination is that the DTV site would be 33 kilometers from the existing NTSC site. However, nowhere in any comments has Sierra suggested that they would be controlling the DTV site from the NTSC site. It would be much more reasonable to assume that the DTV site would be controlled from the studio location. In any case, the 33 kilometer distance means absolutely nothing. The control system does not function in a different fashion whether the path length is 33 kilometers or 1 kilometer. The worst case would be where path fades caused the STL path to become unusable. In such a case, if wire lines could not take over, the transmitter would immediately be placed into an inoperative condition by the fail safe circuitry of the remote control system. There is no basis whatsoever for KOLO-TV to suggest that Sierra could not properly control its transmitter.

In the engineering comments, KOLO-TV argues that significant interference would be caused to KQED. In their comments, it would appear that KOLO-TV is conceding that KQED would be fully spaced to the Slide Mountain

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site for the addition of a new NTSC channel. This was pointed out in the original comments. No detailed interference study was done with respect to KQED because of the fact that it would be fully spaced. However, an interference study utilizing the Longley-Rice propagation model was completed and the information was provided to the Commission. It is noted that the interference numbers projected by KOLO-TV are not in accordance with the numbers that were the result of the study completed by duTreil, Lundeen & Rackley and contained in the original Sierra comments.

It is respectfully submitted that the interference that KOLO-TV estimates to KQED is not correct. It is further submitted that KQED is fully spaced to the proposed DTV site using the spacing contained in the Commission's Rules and Regulations. However, in an abundance of caution, a different antenna pattern has not been selected. The attached data shows a Harris directional antenna which will soon be proposed for use by NTSC for KRNK at the same site as proposed for the DTV allocation. That application is currently being prepared and will be filed with the Commission within the next week. It is proposed that exactly

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the same pattern be utilized for the NTSC pattern as for the DTV pattern. The proposed pattern would provide an additional 8 dB. of protection to KQED viewers. Obviously, that would eliminate any possible interference that might be calculated to exist using the antenna contained in the original comments.

It is noted that the ratio of maximum to minimum for the antenna contained in the attached exhibits is greater than the 10 dB. specified in the Commission's Rules and Regulations. However, the appropriate waiver will be requested. It is noted that the Commission has routinely granted waivers of the 10 dB. ratio in the past where adequate reason existed to utilize the greater directional characteristic.

Again, it should be noted that the tightening of the directional pattern is to provide even more protection than would otherwise be required to KQED. Based upon the mileage involved, no protection is required to KQED as the proposed DTV allotment would be fully spaced to that station. However, by utilizing the directional antenna shown in the attached exhibits,

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or one from a different manufacturer with essentially the same pattern, approximately 16 dB. of protection has been provided to KQED.

It is apparent that the proposed facility would be in accordance with good engineering practice and with the goals set forth by the Commission in the Sixth Report & Order.

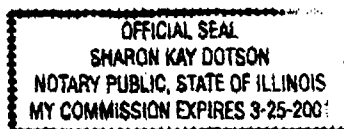
The preceding statement and attached exhibits have been prepared by me or under my direction and are true and correct to the best of my knowledge and belief.

  
Donald L. Markley, P.E.

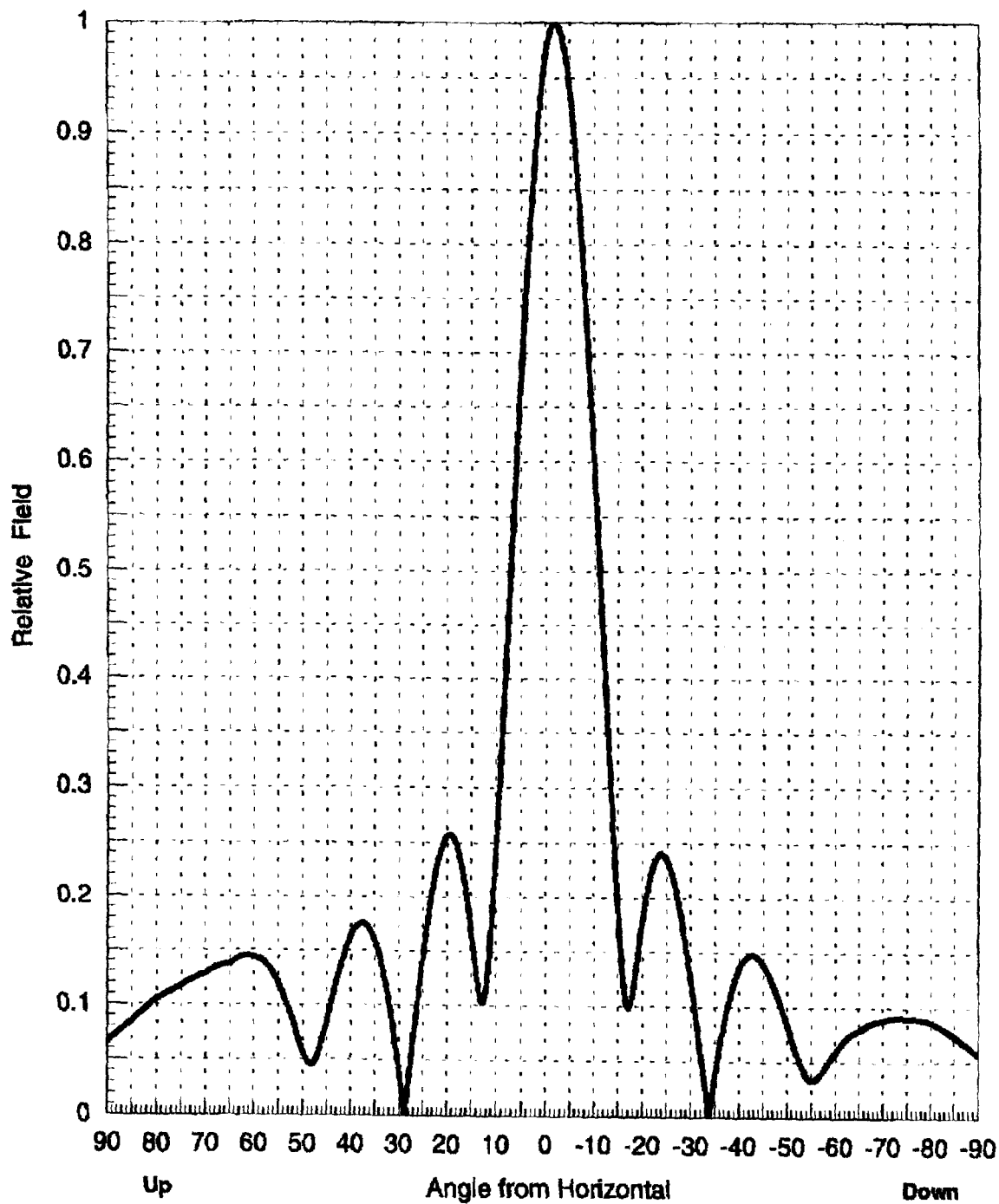
Subscribed and sworn to before me this 2<sup>nd</sup> Day of October 1997.

  
Notary Public

My commission expires:



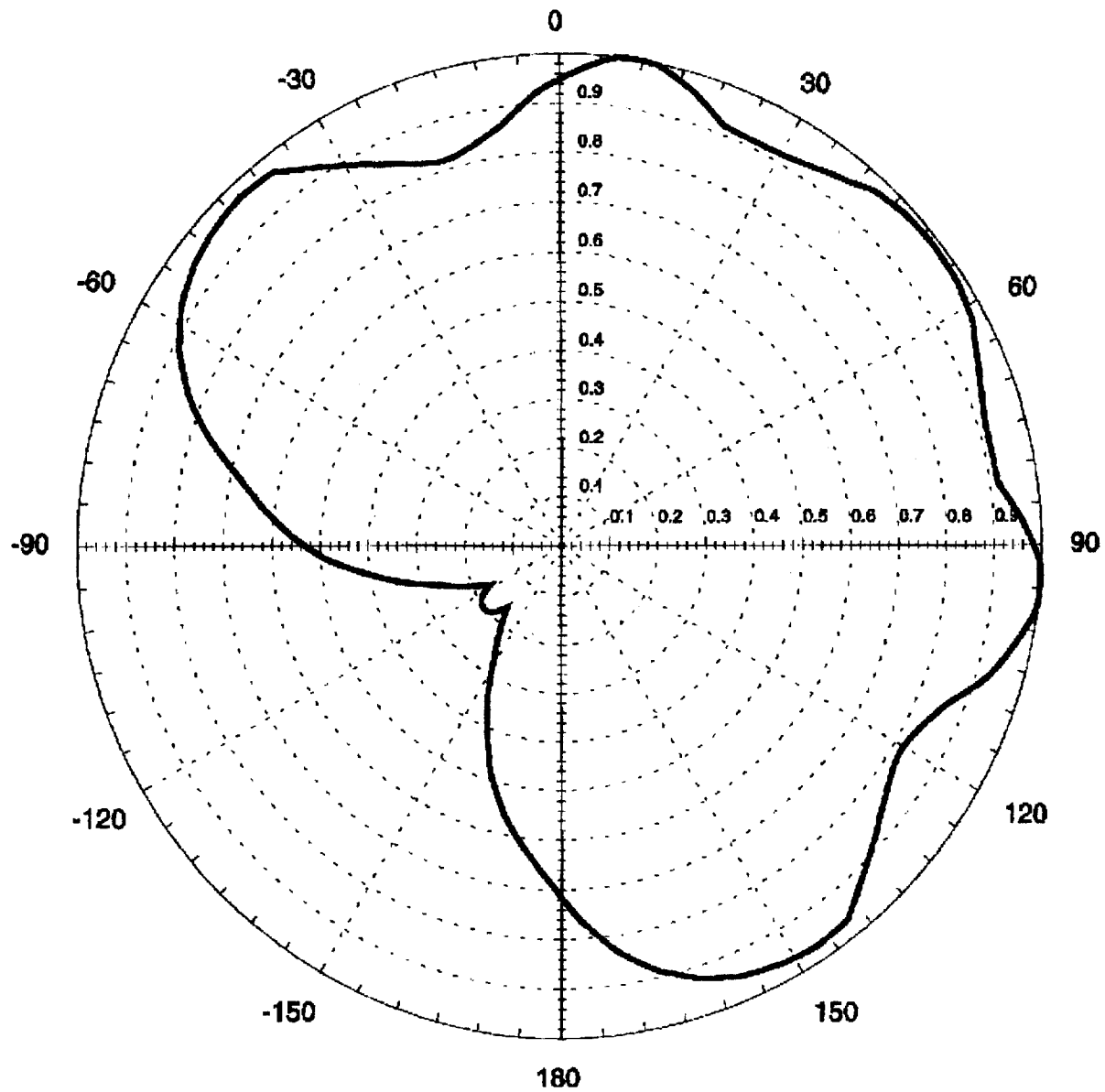
# Calculated Elevation Pattern



Series: TAD

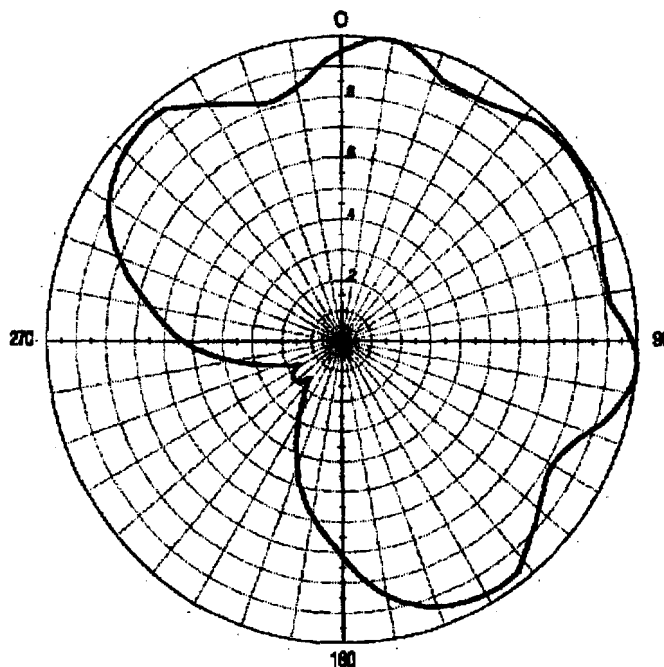
Harris Pattern No.: 7272E01H

# Calculated Relative Field Pattern



Series: TAD  
Harris Pattern No.: 7272A01H

Calculated Relative Field Pattern

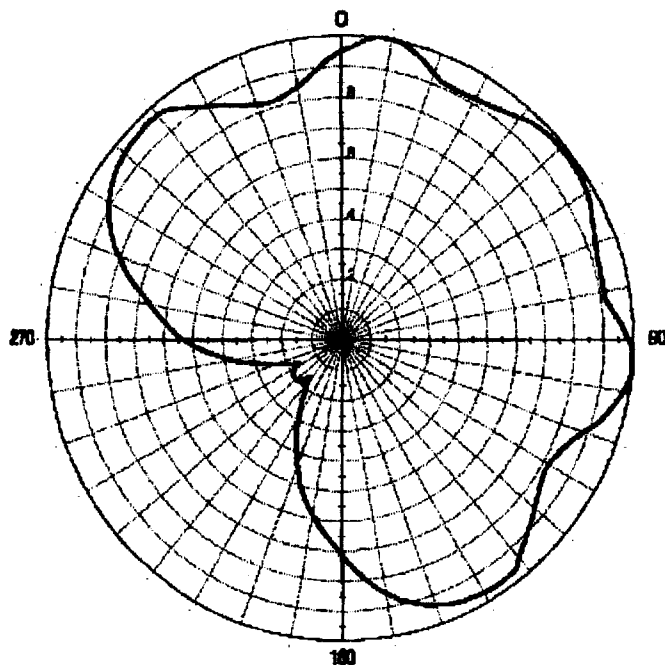


Series: TAD  
Harris Pattern No.: 7272AD1H

CHANNEL 4 TAD-4MA-3/12 HORIZONTAL RADIATION PATTERN

| Azimuth<br>Angle, deg | Relative<br>Amplitude | Azimuth<br>Angle, deg | Relative<br>Amplitude | Azimuth<br>Angle, deg | Relative<br>Amplitude | Azimuth<br>Angle, deg | Relative<br>Amplitude |
|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| 0.0                   | 0.949                 | 75.0                  | 0.918                 | 150.0                 | 0.986                 | 231.0                 | 0.203                 |
| 5.0                   | 0.987                 | 78.0                  | 0.914                 | 155.0                 | 0.965                 | 235.0                 | 0.201                 |
| 9.0                   | 1.000                 | 80.0                  | 0.915                 | 160.0                 | 0.934                 | 240.0                 | 0.178                 |
| 10.0                  | 0.989                 | 85.0                  | 0.942                 | 165.0                 | 0.900                 | 242.0                 | 0.164                 |
| 15.0                  | 0.976                 | 90.0                  | 0.983                 | 170.0                 | 0.853                 | 245.0                 | 0.189                 |
| 20.0                  | 0.933                 | 95.0                  | 1.000                 | 175.0                 | 0.790                 | 250.0                 | 0.236                 |
| 25.0                  | 0.914                 | 100.0                 | 0.980                 | 180.0                 | 0.715                 | 255.0                 | 0.300                 |
| 28.0                  | 0.914                 | 105.0                 | 0.941                 | 185.0                 | 0.647                 | 260.0                 | 0.375                 |
| 30.0                  | 0.917                 | 110.0                 | 0.886                 | 190.0                 | 0.586                 | 265.0                 | 0.457                 |
| 35.0                  | 0.932                 | 115.0                 | 0.841                 | 195.0                 | 0.519                 | 270.0                 | 0.533                 |
| 40.0                  | 0.956                 | 120.0                 | 0.820                 | 200.0                 | 0.440                 | 275.0                 | 0.598                 |
| 45.0                  | 0.978                 | 121.0                 | 0.819                 | 205.0                 | 0.360                 | 280.0                 | 0.659                 |
| 50.0                  | 0.985                 | 125.0                 | 0.832                 | 210.0                 | 0.285                 | 285.0                 | 0.731                 |
| 52.0                  | 0.987                 | 130.0                 | 0.862                 | 215.0                 | 0.228                 | 290.0                 | 0.804                 |
| 55.0                  | 0.984                 | 135.0                 | 0.900                 | 220.0                 | 0.180                 | 295.0                 | 0.864                 |
| 60.0                  | 0.975                 | 140.0                 | 0.944                 | 222.0                 | 0.164                 | 300.0                 | 0.906                 |
| 65.0                  | 0.951                 | 145.0                 | 0.988                 | 225.0                 | 0.185                 | 305.0                 | 0.939                 |
| 70.0                  | 0.928                 | 147.0                 | 0.970                 | 230.0                 | 0.202                 | 310.0                 | 0.957                 |

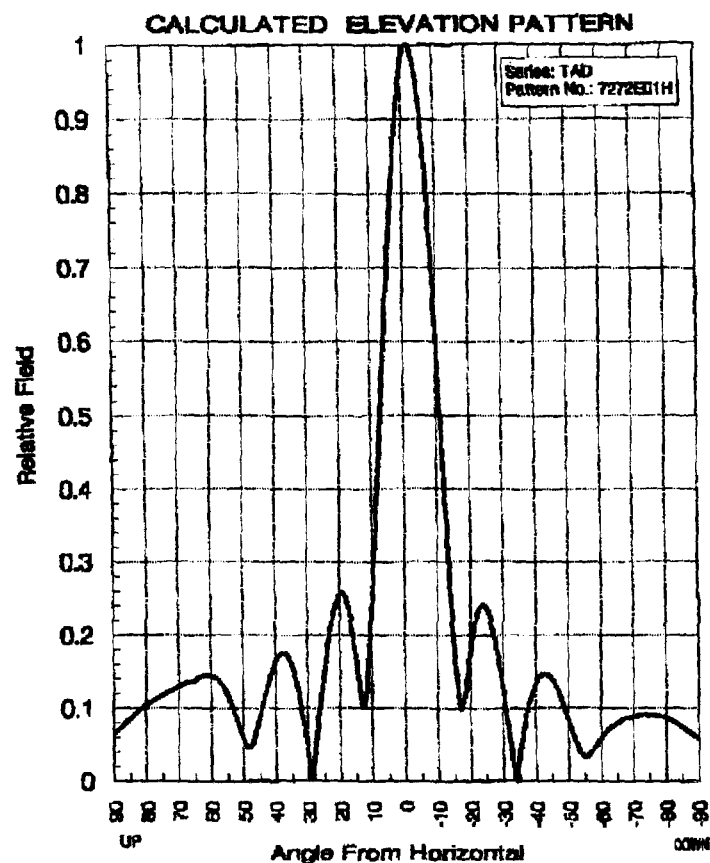
Calculated Relative Field Pattern



Series: TAD  
Harris Pattern No.: 7272AD1H

CHANNEL 4 TAD-4MA-3/12 HORIZONTAL RADIATION PATTERN

| Azimuth<br>Angle, deg | Relative<br>Amplitude |
|-----------------------|-----------------------|
| 315.0                 | 0.968                 |
| 317.0                 | 0.970                 |
| 320.0                 | 0.967                 |
| 325.0                 | 0.934                 |
| 330.0                 | 0.892                 |
| 335.0                 | 0.855                 |
| 340.0                 | 0.827                 |
| 343.0                 | 0.819                 |
| 345.0                 | 0.822                 |
| 350.0                 | 0.846                 |
| 355.0                 | 0.886                 |



CHANNEL 4 TAD-4MA-3/12 VERTICAL RADIATION PATTERN

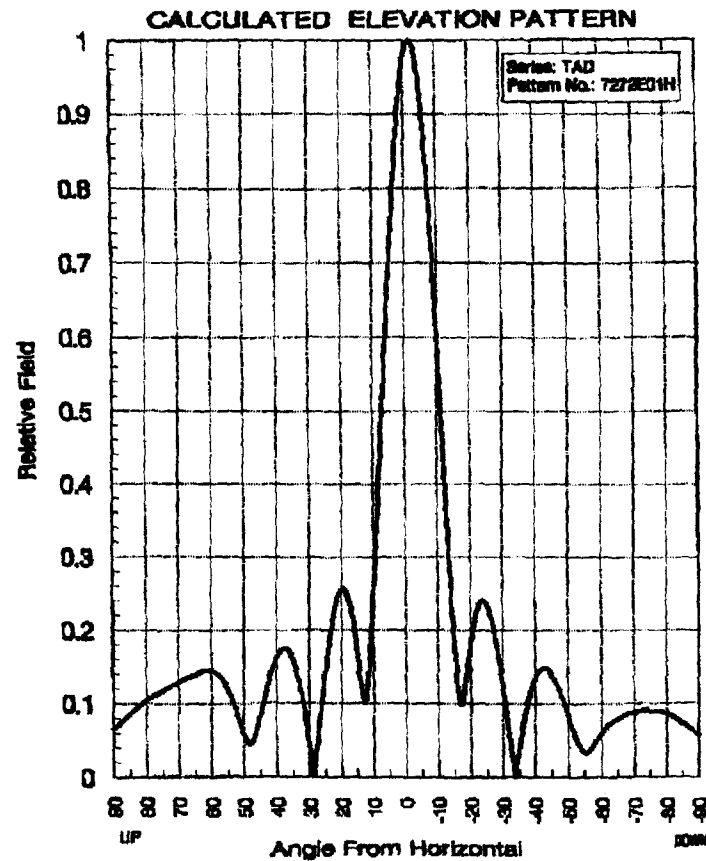
| Elevation<br>Angle, deg | Relative<br>Amplitude |
|-------------------------|-----------------------|
| -5.0                    | 0.938                 |
| -4.0                    | 0.972                 |
| -3.0                    | 0.993                 |
| -2.0                    | 1.000                 |
| -1.9                    | 1.000                 |
| -1.0                    | 0.993                 |
| 0.0                     | 0.973                 |
| 1.0                     | 0.936                 |
| 2.0                     | 0.887                 |
| 3.0                     | 0.827                 |
| 4.0                     | 0.757                 |
| 5.0                     | 0.679                 |
| 6.0                     | 0.594                 |
| 7.0                     | 0.506                 |
| 8.0                     | 0.416                 |
| 9.0                     | 0.328                 |
| 10.0                    | 0.245                 |
| 11.0                    | 0.171                 |

| Elevation<br>Angle, deg | Relative<br>Amplitude |
|-------------------------|-----------------------|
| 12.0                    | 0.117                 |
| 12.8                    | 0.102                 |
| 13.0                    | 0.104                 |
| 14.0                    | 0.128                 |
| 15.0                    | 0.166                 |
| 16.0                    | 0.201                 |
| 17.0                    | 0.229                 |
| 18.0                    | 0.247                 |
| 19.0                    | 0.256                 |
| 19.8                    | 0.257                 |
| 20.0                    | 0.255                 |
| 21.0                    | 0.247                 |
| 22.0                    | 0.230                 |
| 23.0                    | 0.206                 |
| 24.0                    | 0.177                 |
| 25.0                    | 0.144                 |
| 26.0                    | 0.108                 |
| 27.0                    | 0.070                 |

| Elevation<br>Angle, deg | Relative<br>Amplitude |
|-------------------------|-----------------------|
| 29.0                    | 0.032                 |
| 29.9                    | 0.002                 |
| 29.0                    | 0.005                 |
| 30.0                    | 0.040                 |
| 31.0                    | 0.073                 |
| 32.0                    | 0.101                 |
| 33.0                    | 0.125                 |
| 34.0                    | 0.145                 |
| 35.0                    | 0.160                 |
| 36.0                    | 0.170                 |
| 37.0                    | 0.175                 |
| 37.6                    | 0.176                 |
| 38.0                    | 0.175                 |
| 39.0                    | 0.171                 |
| 40.0                    | 0.163                 |
| 41.0                    | 0.151                 |
| 42.0                    | 0.137                 |
| 43.0                    | 0.121                 |

| Elevation<br>Angle, deg | Relative<br>Amplitude |
|-------------------------|-----------------------|
| 44.0                    | 0.103                 |
| 45.0                    | 0.085                 |
| 46.0                    | 0.067                 |
| 47.0                    | 0.053                 |
| 48.0                    | 0.046                 |
| 48.3                    | 0.046                 |
| 49.0                    | 0.048                 |
| 50.0                    | 0.058                 |
| 51.0                    | 0.071                 |
| 52.0                    | 0.084                 |
| 53.0                    | 0.087                 |
| 54.0                    | 0.109                 |
| 55.0                    | 0.119                 |
| 56.0                    | 0.126                 |
| 57.0                    | 0.135                 |
| 58.0                    | 0.140                 |
| 59.0                    | 0.142                 |
| 60.0                    | 0.143                 |

| Elevation<br>Angle, deg | Relative<br>Amplitude |
|-------------------------|-----------------------|
| 61.0                    | 0.145                 |
| 61.9                    | 0.145                 |
| 62.0                    | 0.145                 |
| 63.0                    | 0.144                 |
| 64.0                    | 0.141                 |
| 65.0                    | 0.137                 |
| 66.0                    | 0.137                 |
| 67.0                    | 0.136                 |
| 68.0                    | 0.134                 |
| 69.0                    | 0.131                 |
| 70.0                    | 0.128                 |
| 71.0                    | 0.127                 |
| 72.0                    | 0.125                 |
| 73.0                    | 0.122                 |
| 74.0                    | 0.120                 |
| 75.0                    | 0.117                 |
| 76.0                    | 0.115                 |
| 77.0                    | 0.112                 |



CHANNEL 4 TAD-4MA-3/12 VERTICAL RADIATION PATTERN

| Elevation Angle, deg | Relative Amplitude |
|----------------------|--------------------|
| -90.0                | 0.057              |
| -89.0                | 0.061              |
| -88.0                | 0.064              |
| -87.0                | 0.067              |
| -86.0                | 0.071              |
| -85.0                | 0.074              |
| -84.0                | 0.077              |
| -83.0                | 0.079              |
| -82.0                | 0.082              |
| -81.0                | 0.084              |
| -80.0                | 0.087              |
| -79.0                | 0.088              |
| -78.0                | 0.088              |
| -77.0                | 0.090              |
| -76.0                | 0.090              |
| -75.0                | 0.090              |
| -74.0                | 0.090              |
| -73.0                | 0.091              |

| Elevation Angle, deg | Relative Amplitude |
|----------------------|--------------------|
| -72.7                | 0.091              |
| -72.0                | 0.090              |
| -71.0                | 0.090              |
| -70.0                | 0.088              |
| -69.0                | 0.088              |
| -68.0                | 0.086              |
| -67.0                | 0.084              |
| -66.0                | 0.082              |
| -65.0                | 0.079              |
| -64.0                | 0.077              |
| -63.0                | 0.074              |
| -62.0                | 0.070              |
| -61.0                | 0.065              |
| -60.0                | 0.059              |
| -59.0                | 0.053              |
| -58.0                | 0.047              |
| -57.0                | 0.040              |
| -56.0                | 0.035              |

| Elevation Angle, deg | Relative Amplitude |
|----------------------|--------------------|
| -55.0                | 0.033              |
| -54.0                | 0.037              |
| -53.0                | 0.045              |
| -52.0                | 0.056              |
| -51.0                | 0.069              |
| -50.0                | 0.083              |
| -49.0                | 0.096              |
| -48.0                | 0.109              |
| -47.0                | 0.121              |
| -46.0                | 0.131              |
| -45.0                | 0.139              |
| -44.0                | 0.145              |
| -43.0                | 0.148              |
| -42.6                | 0.148              |
| -42.0                | 0.147              |
| -41.0                | 0.143              |
| -40.0                | 0.135              |
| -39.0                | 0.123              |

| Elevation Angle, deg | Relative Amplitude |
|----------------------|--------------------|
| -38.0                | 0.107              |
| -37.0                | 0.087              |
| -36.0                | 0.083              |
| -35.0                | 0.037              |
| -34.0                | 0.007              |
| -33.6                | 0.001              |
| -33.0                | 0.024              |
| -32.0                | 0.057              |
| -31.0                | 0.090              |
| -30.0                | 0.123              |
| -29.0                | 0.153              |
| -28.0                | 0.181              |
| -27.0                | 0.205              |
| -26.0                | 0.223              |
| -25.0                | 0.236              |
| -24.0                | 0.241              |
| -23.8                | 0.241              |
| -23.0                | 0.237              |


| Elevation Angle, deg | Relative Amplitude |
|----------------------|--------------------|
| -22.0                | 0.228              |
| -21.0                | 0.208              |
| -20.0                | 0.178              |
| -19.0                | 0.144              |
| -18.0                | 0.111              |
| -17.1                | 0.068              |
| -17.0                | 0.099              |
| -16.0                | 0.126              |
| -15.0                | 0.165              |
| -14.0                | 0.259              |
| -13.0                | 0.341              |
| -12.0                | 0.427              |
| -11.0                | 0.515              |
| -10.0                | 0.602              |
| -9.0                 | 0.684              |
| -8.0                 | 0.760              |
| -7.0                 | 0.829              |
| -6.0                 | 0.888              |

**CERTIFICATE OF SERVICE**

I, Lorraine Handel, hereby certify that on this 3rd day of October, 1997, I caused copies of the foregoing "Reply to KOLO-TV Opposition to Supplement to Petition for Reconsideration" to be mailed via first-class, postage prepaid mail to the following:

Richard M. Smith, Chief  
Office of Engineering & Technology  
Federal Communications Commission  
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Washington, D.C. 20005

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Lorraine Handel